



MISSOURI ETHICS COMMISSION

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James Klahr

Executive Director

October 11, 2016

Cole Noble
Cole Noble Campaign Fund
10125 Hwy EE
Richmond MO 64085

Re: File No. 16-0099-I

Dear Mr. Noble:

The Missouri Ethics Commission considered the complaint filed against you at its October 7, 2016 meeting. The complaint alleges that you failed to report certain expenditures made by your company, Noble Unlimited, as in-kind contributions for Cole Noble Campaign Fund. The complaint further alleges that, at certain events where Noble Unlimited made in-kind contributions, there was a cash donation jar but you did not report receiving cash contributions on the committee's campaign finance reports.

Staff review of this complaint determined that Noble Unlimited LLC formed in March 2014 with the Secretary of State. You formed the candidate committee Cole Noble Campaign Fund in April 2016. The committee files its campaign finance reports with the Missouri Ethics Commission.

In May and June of 2016, Noble Unlimited made expenditures totaling \$732.78 which Cole Noble Campaign Fund reported as in-kind contributions from Noble Unlimited on the committee's July 2016 Quarterly Report. Section 130.041.1(3)(d), RSMo, requires that the committee report the total dollar value of all in-kind contributions received but does not require the committee to specifically describe the nature of the in-kind contribution.

Staff review determined that Noble Unlimited made three separate expenditures which Cole Noble Campaign Fund reported as in-kind contributions. Two of the expenditures were for a booth at local community events where you could promote your candidacy. The third expenditure was to purchase food and beverages for a meet and greet for local candidates, including you. These in-kind contributions were timely reported on the committee's July 2016 Quarterly Report.

Staff also reviewed the allegation regarding the cash donation jar located on the booth table during at least one of the community events and whether cash deposited into the donation jar should have been reported by the committee as cash contributions. Staff determined that the cash contributions were donations to help Noble Unlimited defray some of the costs when it

distributed free popcorn and cotton candy to the public. These donations went to the company rather than the committee. Therefore, the committee was not required to report receipt of cash contributions.

From the facts presented, the Commission finds no reasonable grounds exist to support a violation of Chapter 130, RSMo, and is dismissing the complaint.

Sincerely,



James Klahr
Executive Director